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9 **BEFORE THE**
BOARD OF REGISTERED NURSING
10 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

11 In the Matter of the Accusation Against:

Case No. *2011-462*

12 **YOLANDA VASQUEZ RAMIREZ**
13 **Post Office Box 6084**
Brownsville, TX 78523
14 **Registered Nurse License No. 577220**

A C C U S A T I O N

15 Respondent.

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17 Complainant alleges:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her
20 official capacity as the Interim Executive Officer of the Board of Registered Nursing, Department
21 of Consumer Affairs.

22 2. On or about February 14, 2001, the Board of Registered Nursing issued Registered
23 Nurse License Number 577220 to Yolanda Vasquez Ramirez (Respondent). The Registered
24 Nurse License was in full force and effect at all times relevant to the charges brought in this
25 Accusation and will expire on December 31, 2012, unless renewed.
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10. The underlying conduct supporting the Texas Board's disciplinary action is that on or about February 3, 2005, while employed as a Nurse Practitioner with Paul Albert Lenz, M.D., P.A., in Brownsville, Texas, Respondent misappropriated non-narcotic samples of pharmaceuticals from the facility and its patients.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters alleged in this Accusation, and that following the hearing, the Board of Registered Nursing issue a decision:

1. Revoking or suspending Registered Nurse License Number 577220, issued to Yolanda Vasquez Ramirez;

2. Ordering Yolanda Vasquez Ramirez to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;

3. Taking such other and further action as deemed necessary and proper.

DATED: November 15, 2010

Louise R. Bailey
 LOUISE R. BAILEY, M.ED., RN
 Interim Executive Officer
 Board of Registered Nursing
 Department of Consumer Affairs
 State of California
Complainant

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